

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MISS UNIVERSE L.P., LLLP and :
DONALD J. TRUMP, :
Plaintiffs, :
-against- : Case No. 1:15-cv-5377 (JGK)
UNIVISION NETWORKS & STUDIOS, INC. and :
ALBERTO CIURANA, individually, :
Defendants. :
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**DECLARATION OF RANDY M. MASTRO IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT**

Randy M. Mastro hereby declares as follows:

1. I am a member of the bar of this Court and a Partner of the law firm of Gibson, Dunn & Crutcher LLP, counsel to Univision Networks & Studios, Inc. and Alberto Ciurana (collectively, "Defendants"). I submit this declaration in support of Defendants' Motion to Dismiss the Amended Complaint.
2. Attached as Exhibit A is a true and correct copy of the License Agreement for Miss Universe, Miss USA, and Miss Teen USA Final Events, dated January 14, 2015, executed by Miss Universe L.P., LLLP and Univision Networks & Studios, Inc.
3. Attached as Exhibit B is a true and correct copy of an article by the Washington Post Staff, *Donald Trump announces a presidential bid*, WASHINGTON POST (June 16, 2015), retrieved from <http://www.washingtonpost.com/blogs/post-politics/wp/2015/06/16/full-text-donald-trump-announces-a-presidential-bid/>.

4. Attached as Exhibit C is a true and correct copy of a posting on the Instagram account of Alberto Ciurana, dated June 25, 2015.

5. Attached as Exhibit D is a true and correct copy of an article by Taegan Goddard, *Trump Admits He's Thin-Skinned*, POLITICAL WIRE (July 24, 2015), retrieved from <http://politicalwire.com/2015/07/24/trump-admits-hes-thin-skinned/>.

6. Attached as Exhibit E is a true and correct copy of a webpage from the "Financial Information" tab of the "Investor Relations" section at Univision.com, retrieved from <http://corporate.univision.com/corporate/investor-relations/financial-information/>.

7. Attached as Exhibit F is a true and correct copy of an excerpt from Amendment No. 2 to Form S-1 filed by Univision Holdings, Inc. with the Securities Exchange and Commission ("SEC") on September 4, 2015.

8. Attached as Exhibit G are true and correct copies of webpages retrieved from <http://www.missuniverse.com/info/history> and <http://www.trump.com/entertainment/trump-pageants> on July 30, 2015.

9. Attached as Exhibit H is a true and correct copy of a webpage from the Miss USA section of MissUniverse.com, entitled "Univision Enters Into Long Term Partnership with Miss Universe Organization," dated February 5, 2015, retrieved from <http://www.missuniverse.com/missusa/news/view/537#.VdPECJfN7QM>.

10. Attached as Exhibit I is a true and correct copy of an article by Alexander Burns, *Donald Trump, Pushing Someone Rich, Offers Himself*, NEW YORK TIMES (June 16, 2015), retrieved from <http://www.nytimes.com/2015/06/17/us/politics/donald-trump-runs-for-president-this-time-for-real-he-says.html?ref=topics>.

11. Attached as Exhibit J is a true and correct copy of an article by Reid J. Epstein & Heather Haddon, *Donald Trump Vows to Disrupt Crowded GOP Presidential Race*, WALL STREET JOURNAL (June 16, 2015), retrieved from <http://www.wsj.com/articles/donald-trump-to-unveil-plans-for-2016-presidential-race-1434448982>.

12. Attached as Exhibit K is a true and correct copy of an article by Eugene Scott, *Trump defends inflammatory comments, asks 'Who is doing the raping?'*, CNN (July 2 2015), retrieved from <http://www.cnn.com/2015/07/01/politics/donald-trump-immigrants-raping-comments/>.

13. Attached as Exhibit L is a true and correct copy of an article by Benjamin Landy, *'Totally accurate': Trump defends calling Mexican immigrants 'rapists,'* MSNBC (June 30, 2015), retrieved from <http://www.msnbc.com/msnbc/totally-accurate-trump-defends-calling-mexican-immigrants-rapists>.

14. Attached as Exhibit M is a true and correct copy of an article by Hunter Walker, *Donald Trump just released an epic statement raging against Mexican immigrants and 'disease,'* BUSINESS INSIDER (July 6, 2015), retrieved from <http://www.businessinsider.com/donald-trumps-epic-statement-on-mexico-2015-7>.

15. Attached as Exhibit N is a true and correct copy of an article by the Associated Press, *Reelz channel will air Miss USA pageant, but who will host it?*, FOX NEWS (July 2, 2015), retrieved from <http://www.foxnews.com/entertainment/2015/07/02/reelz-channel-will-air-miss-usa-pageant-but-who-will-host-it/>.

16. Attached as Exhibit O is a true and correct copy of an article by Leila Cobo, *J Balvin Cancels Miss USA Performance After Donald Trump's Comments on Latins: Exclusive,*

BILLBOARD (June 24, 2015), retrieved from <http://www.billboard.com/articles/columns/latin/6605876/j-balvin-cancels-miss-usa-performance-donald-trump-latin-comments>.

17. Attached as Exhibit P is a true and correct copy of an article by Reuters, *Mexico won't send candidate to Miss Universe over Trump comments-Televisa*, REUTERS (June 29, 2015), retrieved from <http://www.reuters.com/article/2015/06/30/trump-mexico-idUSL2N0ZG03C20150630>.

18. Attached as Exhibit Q is a true and correct copy of an article by Brian Stelter, *Univision dumps Trump, cancels Miss USA over his comments about Mexicans*, CNN MONEY (June 25, 2015), retrieved from <http://money.cnn.com/2015/06/25/media/univision-donald-trump-mexicans/index.html?iid=EL>.

19. Attached as Exhibit R is a true and correct copy of a letter from Arya Towfighi of Univision to Michael Cohen, of the Trump Organization, and Miss Universe L.P., LLLP, dated June 30, 2015.

20. Attached as Exhibit S is a true and correct copy of an article by Kyle McCarthy, *The Complete Interactive List of Those Dumping Trump*, HUFFINGTON POST (July 7, 2015), retrieved from http://www.huffingtonpost.com/kyle-mccarthy/the-complete-interactive-b_7733370.html.

21. Attached as Exhibit T is a true and correct copy of a posting on the Instagram account of Alberto Ciurana, dated June 26, 2015.

22. Attached as Exhibit U is a true and correct copy of an excerpt from a filing by Donald J. Trump to the Federal Elections Commission entitled "Executive Branch Personnel Public Financial Disclosure Report," dated July 15, 2015.

23. Attached as Exhibit V is a true and correct copy of a posting on the Twitter account of Donald J. Trump, dated July 20, 2015.

24. Attached as Exhibit W is a true and correct copy of a posting on the Twitter account of Donald J. Trump, dated September 11, 2015.

25. Attached as Exhibit X is a true and correct copy of a transcript of a hearing held on October 20, 2015 in *Miss Universe, L.P., LLLP et al. v. Univision Networks & Studios, Inc., et al.*, No. 1:15-cv-5377.

I hereby declare, under penalty of perjury, that the foregoing is true and correct.

Dated: New York, New York
December 4, 2015

/s/ Randy M. Mastro
Randy M. Mastro

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